

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

ROBERT MOORE
Plaintiff,

v.

**U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT; U.S. CUSTOMS AND
BORDER PROTECTION; AND
U.S. DEPARTMENT OF HEALTH
AND HUMAN SERVICES,
Defendants.**

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EP-19-CV-00279-DCG

JOINT REPORT ON ALTERNATIVE DISPUTE RESOLUTION

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW, Plaintiff Robert Moore, by and through his attorney of record, and Defendants United States Immigration and Customs Enforcement (“ICE”), United States Customs and Border Protection (“CBP”), and United States Department of Health and Human Services (“HHS”) (collectively referred hereinafter as “Defendants”), by and through the United States Attorney for the Western District of Texas, (hereafter the “Parties”) and file this Joint Report on Alternative Dispute Resolution (“ADR”) in compliance with the Court’s Scheduling Order and Local Rule CV-88, and would show the Court the following:

1. Status of settlement negotiations: The parties have negotiated and presented the Court with their proposed production schedule for Defendants release of responsive records to Plaintiff’s Freedom of Information Act (“FOIA”) requests. Compliance with the proposed scheduling order is likely to resolve or narrow the issues in the instant case.

2. The persons responsible for settlement negotiations: Assistant United States Attorney Manuel Romero for the Defendants, and Christopher Benoit and Lynn Coyle, Attorneys for Plaintiff.

3. Method of ADR and provider: The parties do not believe ADR is appropriate in this case at this time.

Submitted this 17th day of January, 2020.

Respectfully submitted,

JOHN F. BASH
UNITED STATES ATTORNEY

/s/ Manuel Romero
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